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VIA ECF

Hon. Brian R. Martinotti, U.S.D.J.
United States District Court, District of New Jersey
Frank Lautenberg Post Office & U.S. Courthouse
2 Federal Plaza, 3rd Floor
Newark, New Jersey 07102

Re: *In re Insulin Pricing Litigation*, Case No. 2:23-md-3080 (BRM/RLS)

Dear Judge Martinotti,

Undersigned counsel represent the plaintiffs in *LDG Medical Services Group et al. v. Eli Lilly and Company et al.*, Case No. 23-cv-01515 (D.P.R.) and *Sistema Integrado de Salud del Oeste, L.L.C. ("SISO") et al. v. Eli Lilly and Company et al.*, Case 3:34-cv-01315 (D.P.R.), independent physician associations that bear the costs of insulin for their beneficiaries in Puerto Rico (collectively, the "Puerto Rico Plaintiffs"). On behalf of Puerto Rico Plaintiffs, undersigned counsel files this supplement to a pre-motion letter previously filed on October 9, 2024. [R. Doc. 307].

Puerto Rico Plaintiffs submitted the pre-motion letter requesting leave to file a joint motion for remand to the Puerto Rico territorial court and, therein, proposed a briefing schedule that would commence today. Given that the Court has not yet granted leave to file the motion, Plaintiffs file this supplement to clarify that the briefing schedule will not begin until this Court grants leave.

With this supplemental letter, Puerto Rico plaintiffs request permission to file their joint motion for remand at the appropriate time, for which the Puerto Rico Plaintiffs will await the Court's determination. Puerto Rico Plaintiffs have conferred with counsel to the Caremark Defendants, who have agreed on the following proposed briefing schedule, upon the Court's grant of leave.

10 days after leave is granted	Deadline for Puerto Rico Plaintiffs to file the joint motion.
45 days after joint motion is filed	Deadline for Caremark Defendants to file an opposition to the joint motion.
21 days after opposition is filed	Deadline for Puerto Rico Plaintiff to file a reply in support of the joint motion.

Respectfully submitted,

/s/ Jason W. Burge

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